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12 UNITED STATES OF AMERICA
13
14 BEFORE THE NATIONAL LABOR RELATIONS BOARD
15

16 TARLTON AND SON, INC.,

17 Employer/Respondent,

18 and

19 ROBERT MUNOZ,

20 An Individual/Charging Party.

Case Nos. 32-CA-119054; 32-CA-126896

**RESPONSE TO MOTION FOR
RECONSIDERATION**

21 The Motion for Reconsideration should be immediately rejected. The Motion was filed
22 on the last day possible as a delay tactic. The Motion does not state any basis for the Board to
23 reconsider its Decision in this case. All that the motion does is re-argue the case which it lost.

24 The Board should direct the lawyers who filed this to reimburse their own client for any
25 fees that were incurred in preparing this motion. This will discourage these kinds of frivolous
26 filings.

27 Dated: June 2, 2016

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

28 By: /S/ DAVID A. ROSENFELD
DAVID A. ROSENFELD
LISL R. SOTO
Attorneys for Charging Party

**PROOF OF SERVICE
(CCP §1013)**

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On June 2, 2016, I served the following documents in the manner described below:

RESPONSE TO MOTION FOR RECONSIDERATION

- ☒ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Weinberg, Roger & Rosenfeld for collection and processing of correspondence for mailing with the United States Parcel Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Alameda, California.
- ☒ (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from kshaw@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

Mr. James A. Bowles Mr. Richard S. Zuniga Hill, Farrer & Burrill, LLP 300 South Grand Avenue, 37th Floor Los Angeles, CA 90071 jbowles@hillfarrer.com rzuniga@hillfarrer.com	George P. Velastegui Regional Director National Labor Relations Board, Region 32 1301 Clay Street, Room 300N Oakland, CA 94612-5211 George.Velastegui@nlrb.gov
Amy Berbower National Labor Relations Board, Region 32 1301 Clay Street, Room 300N Oakland, CA 94612-5211 Amy.Berbower@nlrb.gov	

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 2, 2016, at Alameda, California.

/s/ Katrina Shaw

Katrina Shaw